

1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION

4 YITZCHAK SIMON,)
5 Plaintiff,)
6 v.) Case No.
7 TISHAURA ONEDA JONES,) 4:23-cv-00955
8 et al.,)
9 Defendants.)

10
11 DEPOSITION OF NANCY CROSS
12

13 TAKEN ON BEHALF OF THE PLAINTIFF
14

15 SEPTEMBER 25, 2024
16

1 or explained to you --

2 **A. No.**

3 Q. -- his outreach work?

4 **A. It was my understanding that his job at**
5 **St. Patrick Center was his first job with the**
6 **unhoused.**

7 Q. Okay. Have you ever heard of Tent
8 Mission?

9 **A. Yes.**

10 Q. Okay. Do you know whether or not Mr.
11 Simon had been involved with Tent Mission?

12 **A. I do not.**

13 Q. What is Tent Mission?

14 **A. It's a volunteer organization that**
15 **works -- goes out and does outreach work with the**
16 **unhoused.**

17 Q. Does the St. Louis City staff work with
18 Tent Mission in any way?

19 **A. Not clear to me at this point.**

20 Q. Are you aware of any type of protests
21 or demonstrations that Tent Mission has been
22 involved in against the St. Louis City policies as
23 they relate to the unhoused?

24 **A. Yes.**

25 Q. Okay. What are you aware of?

1 A. That they've had a demonstration in
2 front of city hall that they were part of, I believe
3 it was organized by a different organization. And
4 it was sometime in March of 2023.

5 Q. During this decommissioning of the --

6 A. No, in between.

7 Q. Let me make sure I understand. You
8 were aware in March of 2023 that Tent Mission
9 participated in a demonstration in front of city
10 hall in March of 2023?

11 A. I can't answer that question the way
12 it's worded.

13 Q. Explain to me why.

14 A. Because Tent Mission is an organization
15 that is not -- is horizontally -- is a horizontal
16 structure. So there are one or two people that I
17 had interactions with from Tent Mission, but I don't
18 know the scope of who they are or who actually is
19 part of their organization.

20 I know that there was another
21 organization in town that led a demonstration from
22 the riverfront to city hall, and if they were part
23 of that, they were part of that. But to the best my
24 knowledge it was not a Tent Mission sanctioned event
25 for lack of a better term, like, accredited event.

1 Q. What was the other organization?

2 A. **ArchCity Defenders.**

3 Q. And it's your understanding that this
4 demonstration was organized by ArchCity Defenders?

5 A. **Yes.**

6 Q. Okay. And explain to me everything you
7 know about this demonstration?

8 A. I know that we had tried to
9 decommission on March 10th, the activists prevented
10 that from happening. It was at the end of the day,
11 we decided not to continue that.

12 We had some conversations -- "we" being
13 me, I should say, had some conversations about what
14 we were trying to do and that we had housing and
15 things for the people.

16 And then within a short period of time
17 after that -- so if March 10th was a Friday or
18 Thursday, the following week, and then there was a
19 demonstration led by Blake Strode.

20 Q. Say -- Blake?

21 A. **Blake Strode, S-t-r-o-d-e, who's the**
22 **Executive Director of ArchCity Defenders. And there**
23 **were probably other activists groups with them at**
24 **that time.**

25 Q. Okay. So let me back up here. You

1 motivation.

2 BY MS. BARTH:

3 Q. Okay. Have you ever had anyone tell
4 you that some of these activists do not agree with
5 these services that the city has alleged to provide
6 for these unhoused people?

7 A. Yes.

8 Q. Okay. What have you been told that the
9 activists disagree about whether or not these are
10 appropriate services for these people at the
11 encampment?

12 A. There are some activists that have said
13 they don't want people to be put into shelters, that
14 they want people to go into permanent housing right
15 away.

16 There are some activists that say that
17 we should have housing that allows people to -- very
18 low barrier housing, which means that there are no
19 rules around drugs, alcohol and weapons.

20 There are some that just believe
21 also -- I don't know how much they're included in
22 the group, but have said that people should be
23 allowed to live in and just live and they're not
24 necessarily doing any harm.

25 Q. So one of the things you said is they

1 don't want people to be put in shelters, is moving
2 people from an encampment and into shelters a
3 long-term solution to an unhoused person's problems?

4 **A. No, and it is not our long-term**
5 **solution.**

6 Q. Okay. Is that one of the services you
7 were providing to -- in other words, providing a
8 shelter, is that one of the services that was being
9 offered to the unhoused during this March 5th
10 through March 10th decommissioning?

11 **A. Yes. Or it could be -- there's**
12 **different forms. There's shelters, where everybody**
13 **is in like a dormitory that they really don't like.**
14 **And then there are shelters like Little Sisters**
15 **Mission where you'd have your room and sometimes**
16 **your own bathroom, or you might depending on the**
17 **floor share a bathroom, but you're in a room of your**
18 **own.**

19 Q. Okay. But you would agree with some of
20 these activists that moving persons from an
21 encampment to a shelter isn't necessarily a
22 long-term solution to their unhoused issue?

23 **A. I agree it is not a long-term solution.**
24 **And it is not the long-term solution of the city.**
25 **It's the first step.**

1 Q. But is it accurate that some -- at
2 least some of the unhoused that were at the
3 encampment between March 1st and March 10th, moving
4 them to a shelter was one of the services that the
5 city had provided for them?

6 **A. Yes.**

7 Q. Okay. And so is it fair to say that
8 some of these activists were actively disagreeing
9 with the services that your city staff were
10 providing to those persons at the encampment as far
11 as whether or not they thought they was a reasonable
12 solution?

13 MS. DUNCAN: I'm going to object to
14 speculation. Subject to that, you can answer.

15 **THE WITNESS: I'm sure there are some**
16 **of them that don't agree.**

17 BY MS. BARTH:

18 Q. Okay. And in general would you agree
19 that -- how to deal with the unhoused population in
20 the City of St. Louis is a political issue for the
21 city and for certain activists in this area?

22 MS. DUNCAN: Object as vague. Subject
23 to that, you can answer.

24 **THE WITNESS: I don't know how to**
25 **answer that.**

1 BY MS. BARTH:

2 Q. You would agree that the mayor, you
3 have heard, has made statements while she's been
4 running for office about how to deal with the
5 unhoused issue, correct?

6 A. **I'd have to see it to recall exactly**
7 **what she said, because I don't know that off the top**
8 **of my head.**

9 Q. Okay. Are you saying you are unaware
10 of whether or not the unhoused issue in the City of
11 St. Louis is an issue that politicians, such as the
12 mayor, alderman and activists talk about and
13 discuss?

14 A. **I think it's an issue that they have**
discussed at some point.

16 Q. Okay. And in fact there's a whole city
17 department that is related to the unhoused issue in
18 the city?

19 A. **Subdepartment, yes.**

20 Q. Yes. It's a subdepartment but --

21 A. **Of Human Services.**

22 Q. Okay. But it is a department, correct?

23 A. **Yes.**

24 Q. Okay.

25 A. **It's a division.**

1 Q. It's a division, okay. And you know
2 that there have been protests about how the city has
3 handled the unhoused population in the City of St.
4 Louis?

5 **A. Correct.**

6 Q. There have been multiple demonstrations
7 about it, correct?

8 **A. I only know of one -- two -- I only
9 know of two.**

10 Q. Okay. It has been the subject of --
11 how the city is dealing with the unhoused population
12 has been the subject of newspaper articles, correct?

13 **A. Yes.**

14 Q. Okay. And some persons disagree, some
15 organizations that deal with the unhoused population
16 disagree with how the city has dealt with the
17 unhoused; is that correct?

18 **A. Correct.**

19 Q. Including under Mayor Jones's tenure,
20 correct?

21 **A. Correct.**

22 Q. All right. So with that said, it's
23 fair to say this is an issue that is discussed
24 widely in the City of St. Louis in newspaper
25 articles, activists demonstrations and within the

1 city government of St. Louis?

2 MS. DUNCAN: I'm going to object to
3 speculation. Subject to that, you can answer.

4 **THE WITNESS: And I don't agree.**

5 BY MS. BARTH:

6 Q. So why don't you agree?

7 A. Because I don't think it's widely
8 discussed in the form of -- in the way that you're
9 describing.

10 Q. How would you describe it?

11 A. I would say that there are people that
12 are concerned about the way that we -- the city
13 administration is handling the unhoused issues.
14 Some people have not moved off of the previous
15 administration's position on unhoused. Some
16 activists keep pointing back to something that
17 happened before we got into office.

18 There are a lot of people in the city
19 that want the unhoused to go away and be unseen.
20 And so I don't believe that there are -- that
21 everyone that's talking about this is talking about
22 it in the way that you're trying to portray it.

23 Q. Okay. And what I was getting at before
24 is just saying that it is a political issue, whether
25 or not you agree with what the mayor has done, or

1 you disagree, it is a political issue within the
2 City of St. Louis?

3 MS. DUNCAN: I'm going to object to the
4 phrasing of that as vague. Subject to that, you can
5 answer.

6 **THE WITNESS: I would need you to**
7 **define to me what you mean by "political".**

8 BY MS. BARTH:

9 Q. An issue that is something that the
10 mayor of St. Louis has to deal with?

11 A. Yes.

12 Q. Okay. And you went to law school, we
13 talked about that earlier, right?

14 A. Uh-huh.

15 Q. You have a general idea of what the
16 First Amendment is about, right?

17 A. Uh-huh.

18 Q. Would you agree if someone disagrees
19 with how the city or the mayor is handling the
20 unhoused population that is a matter that is
21 protected by the First Amendment?

22 MS. DUNCAN: I'm going to object --

23 **THE WITNESS: No.**

24 MS. DUNCAN: -- legal conclusion.
25 Subject to that, you can answer.

1 how the mayor of the City of St. Louis is handling
2 an issue such as the unhoused population, your
3 disagreement is something that is protected by the
4 First Amendment?

5 MS. DUNCAN: Objection, legal
6 conclusion. Subject to that, you can answer.

7 **THE WITNESS: I would -- frankly, I**
8 **would need you to tell me -- let me see the First**
9 **Amendment.**

10 BY MS. BARTH:

11 Q. You don't know what the First Amendment
12 says?

13 A. I know what the First Amendment says to
14 a degree, but I haven't been in law school in over
15 35 years, so I am not comfortable answering a
16 question where you're asking me --

17 Q. Okay.

18 A. -- to -- I know there's a list of
19 things. I know it's freedom of speech, freedom of
20 religion and --

21 Q. And I in particular am talking about
22 the freedom of speech.

23 A. Okay. So ask your question again.

24 Q. Your ability to disagree with how the
25 mayor or the City of St. Louis is handling the

1 unhoused situation is protected under your freedom
2 of speech rights under the First Amendment?

3 MS. DUNCAN: Objection, legal
4 conclusion. Subject to that, you can answer.

5 **THE WITNESS: I don't agree, so.**

6 BY MS. BARTH:

7 Q. Okay, you disagree. Okay. And you are
8 the Director of Operations for the City of St. Louis
9 --

10 A. **Correct --**

11 Q. -- and you disagree that statement?

12 A. **-- I am the Director of Operations for
13 the City of St. Louis.**

14 Q. And you disagree with that last
15 statement?

16 A. **The way you're asking the question is
17 not helping me be able to answer it.**

18 Q. Okay. Well, explain to me what you
19 understand a private citizen or any person can do
20 that is protected by the First Amendment if they
21 disagree with how the city or the mayor is handling
22 the unhoused situation.

23 MS. DUNCAN: I'm going to object to
24 legal conclusion. Subject to that, you can answer.

25 **THE WITNESS: So I mean people protest,**

1 **they come in front of city hall, they send letters,**
2 **e-mails, they call, things of that nature, and**
3 **that's -- they have the right to do that.**

4 BY MS. BARTH:

5 Q. Okay. Can persons disagree with city
6 staff members while they are talking to populations
7 of the unhoused --

8 MS. DUNCAN: Objection --

9 Q. -- is that protected by the First
10 Amendment?

11 MS. DUNCAN: Objection, calls for a
12 legal conclusion. Subject to that, you can answer.

13 **THE WITNESS: I feel like that is**
14 **crossing a line and interfering with the staff**
15 **people's ability to do the job that they were**
16 **assigned to do.**

17 BY MS. BARTH:

18 Q. Okay. So let's go back through a
19 couple of these things. One of the things that you
20 talked about earlier was that you were informed that
21 persons were encouraging the some of the unhoused to
22 stay at the riverfront encampment, correct?

23 **A. Uh-huh.**

24 Q. Do you agree or disagree that
25 encouraging unhoused members to stay at the

1 riverfront encampment is protected by the First
2 Amendment?

3 MS. DUNCAN: Objection, calls for a
4 legal conclusion.

5 **THE WITNESS: I disagree.**

6 BY MS. BARTH:

7 Q. You disagree, okay. And what is
8 disagreement based upon?

9 A. That there was never anything cited as
10 to them being upset with what the city was doing,
11 that they were telling people that they could stay
12 because they had the right to stay there. So
13 they're giving advice, not protesting people having
14 to leave.

15 Q. Okay. Do you agree or disagree that
16 persons telling unhoused persons not to accept
17 certain services that the city was offering, do you
18 agree that form of speech is protected by the First
19 Amendment?

20 MS. DUNCAN: Objection, legal
21 conclusion. Subject to that, you can answer.

22 **THE WITNESS: I don't believe that is
23 protected.**

24 BY MS. BARTH:

25 Q. Why?

1 **A. Yep.**

2 Q. -- from Christine Ingrassia?

3 **A. Yes.**

4 Q. And in March of 2023 who was Christine
5 Ingrassia?

6 **A. She was an alderwoman -- no -- that's**
7 **what's getting me screwed up. She works for**
8 **President Megan Green with the Board of Aldermen.**

9 Q. She was no longer an elected alderman
10 at that time?

11 **A. Correct.**

12 Q. She was --

13 **A. She's the Operations Manager for their**
14 **internal stuff.**

15 Q. And her e-mail on March 6th, 2023,
16 says: In anticipation of visiting the encampment
17 and to prepare for her Wednesday morning meeting
18 with Director Cross, President Green would like to
19 have an understanding of any issues causing the
20 timing of this eviction, whether any identified
21 concerns were addressed with the residents of the
22 encampment, what the plan is for rehousing
23 individuals, what outreach has been done to date and
24 if the city moves forward Friday how any belongings
25 left behind will be handled --

1 e-mail.

2 Q. Okay. And did you bring material --
3 information to that meeting on Wednesday?

4 A. Very little in writing. Mostly what I
5 brought to them was the information to answer -- my
6 ability to answer their questions as to what we were
7 doing.

8 Q. When you say "very little in writing",
9 does that mean you did take some stuff?

10 A. No. I talk across the table and tell
11 them what we were doing.

12 Q. So when you said "very little in
13 writing" what I'm asking you is was there any
14 written material?

15 A. No.

16 Q. Okay.

17 A. Not that I recall.

18 Q. What do you recall occurring during
19 this meeting?

20 A. They asked about it, we told them why
21 the decision was made to do this, what the process
22 had been, what we were doing, that we had -- what we
23 had for preparations for rehousing the individuals,
24 the outreach that had been done and where their
25 belongings would be stored.

1 Q. Who did most of the talking on behalf
2 of the city, yourself or Grace?

3 A. Me.

4 Q. Okay. Did anyone in particular do most
5 of the talking on what you said the three other
6 people, Christine, Megan or Jay?

7 A. I think a lot of it was Christine and
8 Megan.

9 Q. Let's start with Cristine Ingrassia.
10 Was she in favor of how the city was planning to
11 decommission the riverfront encampment?

12 A. My opinion is she was not.

13 Q. Okay. What did she express to you that
14 made you believe that she did not agree with how the
15 city was planning to decommission the riverfront --

16 A. I don't --

17 Q. Hold on a minute. Riverfront
18 encampment on March 10th, 2023?

19 A. I don't believe that she -- there was
20 anything specific that I can recall that she said,
21 it's just her general demeanor at the meeting.

22 Q. And how would you describe her general
23 demeanor?

24 A. She had a concern over how the unhoused
25 people were being removed from -- in her words, from

1 Q. Do you know what Mr. Scoggin meant by
2 "partner organizations funded by the City of St.
3 Louis"?

4 A. So we get funding -- we had ARPA
5 funding, we had COVID funding at some point and we
6 get funding from HUD for helping homeless people.

7 And we do -- and our fee process to
8 award bids to particular organizations, depending on
9 the criteria, and those become our partners. They
10 tend to be people that -- we're partnering with
11 people that want to find a long-term cure -- not
12 cure, but a long-term solution to unhoused issues,
13 not just get money from the city.

14 Q. Okay. And is it a fair summary to say
15 that the city is kind of the holding place of those
16 funds that then get disbursed to --

17 A. Yes.

18 Q. -- those types of organizations?

19 A. Yes.

20 Q. And was St. Patrick's one of those
21 organizations that was at least partially funded by
22 those types of funds by the City of St. Louis?

23 A. They get a variety of funds from the
24 City of St. Louis.

25 Q. Okay. I'm going to the next paragraph:

1 **A. Yes.**

2 Q. And then at the bottom-ish it says:

3 List of clients that we attempted to engage and they
4 refused services at The Landing, given bus tickets
5 to go to their choice of housing; do you see that?

6 **A. Yes.**

7 Q. And then on the page here there's
8 someone named Nick Desideri?

9 **A. Yes.**

10 Q. Who is that?

11 **A. He was the Communications Director for**
12 **the mayor's office.**

13 Q. Okay. I'm trying to understand, is
14 this an e-mail from Nick to you?

15 **A. It's from me to Nick. So what it is is**
16 **that Nick -- there were two Nicks -- Nick Dunne, who**
17 **was assigned to DHS as a communications person, and**
18 **Nick Desideri that was his manager.**

19 Dunne was out. Desideri was getting
20 questions -- the same questions over and over again.
21 And I responded that we've already answered these
22 questions and we need to start trying to come up
23 with feeding into the bad information, that we need
24 to give the information we have and that's the
25 information that's attached here, so.

1 Q. Okay. So let me make sure I understand
2 this. When you say we were getting the same
3 questions over and over again, what are you
4 referring to?

5 **A. Press.**

6 Q. And what do you consider the press?

7 **A. It would have been whatever newspaper**
8 **or reporters are calling, those two on a regular**
9 **basis.**

10 Q. Okay. And when you say you were
11 getting the same question over and again, what type
12 of questions were you getting?

13 **A. We would get: How many people were at**
14 **the encampment, how many people were housed, how**
15 **many people didn't get housed, when were they**
16 **housed, where were they housed, how long is the**
17 **housing for and a series of questions along those**
18 **lines, depending on who the reporter is and how**
19 **in-depth they want to go.**

20 Q. And it was related to this March 10th
21 decommissioning?

22 **A. I'm assuming, yes.**

23 Q. Okay. Because this is --

24 **A. March 21st.**

25 Q. -- this e-mail is March 21st, before

1 that was the second event at the decommissioning of
2 the riverfront encampment, correct?

3 **A. Correct.**

4 Q. And why was it necessary to have a
5 second decommission?

6 **A. Because there had been activity and
7 people back down at that location and that was not a
8 safe place for people to be.**

9 Q. Do you know whether or not
10 Mr. Scoggin's office prior to the March 27th event
11 had any conversations, planning, preparing for that
12 event with St. Patrick Center?

13 **A. I am not aware of that -- or I do not
14 know.**

15 Q. What involvement did you have on
16 March 27th at the decommissioning?

17 **A. I was not at the site because I had --
18 I forgot, there was something else going on that
19 day. We made sure that they had the -- what they
20 needed as far as bags for people who wanted to take
21 stuff with them, the ability for their stuff to be
22 put in storage, where it was going to go, and people
23 to clean up the needles and other paraphernalia once
24 people were moved out.**

25 Q. When did you personally get involved in

1 alerted the chief of staff and the mayor that there
2 were -- and the communications people that there
3 were some issues happening with that
4 decommissioning, and I wasn't sure it was going to
5 be completed, and that there was a -- we were having
6 activists interfering in our ability to move people.

7 Q. And again, when you talk about
8 interfering in your ability to move people it's all
9 those things we talked about before?

10 A. Uh-huh.

11 Q. Okay. So what did you after that,
12 after you informed the chief of staff and mayor?

13 A. I didn't do anything at that particular
14 moment. The mayor said she would like to call
15 D'Agostino and talk to him about what was going on,
16 so she made a phone call and he did not pick up.

17 He then called me, and she was with me,
18 and she and I proceeded to have a conversation with
19 him about the behavior of his staff person and the
20 work -- what we were trying to do, and how we
21 thought we had an understanding that we were all
22 moving in the same direction.

23 Q. What did you or the mayor say to
24 Mr. D'Agostino specifically?

25 A. That he had a staff person down there

1 that it wasn't -- that -- it's not specifically, but
2 the gist of it was he had a staff person down there
3 who was interfering with our ability to move people.
4 We thought we had an understanding that we were all
5 trying to move people into shelters and housing. We
6 had facilities for people and that he was in the --
7 his staff person was not living up to what the St.
8 Patrick's mission was.

9 Q. Would this phone call have been in the
10 morning?

11 A. It was probably around noon-ish.

12 Q. All right. Does it refresh your
13 recollection that the first phone call between you
14 and Mr. D'Agostino was sometime around 10:00 a.m.?

15 A. No.

16 Q. Okay. You don't think that happened?

17 A. It might have happened, I don't -- you
18 asked me if it refreshed me, I'm not -- I usually
19 have a standing 10 o'clock meeting with the health
20 director, so.

21 Q. So during the first phone call that you
22 and the mayor had with Mr. D'Agostino did you
23 discuss the funding of St. Patrick Center?

24 A. Not that I recall.

25 Q. Okay. Did you have a second phone call

1 This staff person was trying to again stop people
2 from taking the services and moving to a different
3 location, which would provide them with housing.

4 Q. Okay. That was your position. What
5 was Mr. D'Agostino's position?

6 A. He didn't necessarily disagree, but he
7 added that he had checked and Mr. Simon was on a
8 vacation day.

9 Q. And so was not down at the riverfront
10 encampment actually working for St. Patrick Center?

11 A. Allegedly, right.

12 Q. Well, what do you mean by "allegedly",
13 you didn't believe Mr. D'Agostino?

14 A. It's not a matter of believing. They
15 agreed to a certain mission and how their staff was
16 going to work with us, and this person whether he
17 was there as a volunteer or not, was not holding up
18 what they had had conversations with Yusef Scoggins
19 about.

20 Q. And what was your purpose in making
21 this phone call to Mr. D'Agostino?

22 A. To have Mr. Simon pulled back and not
23 continue.

24 Q. Pulled back in what way?

25 A. Have him leave the riverfront and let

1 us do the work that we were doing.

2 Q. I thought you said this phone call
3 happened late Friday or early Monday?

4 A. Okay. The late Friday, early Monday
5 was he called me again, I know he's not on the
6 company time and everything. And he said they were
7 going look into it and they would do some kind of
8 discipline and they were going to do what they
9 needed to do.

10 At some point, I don't know which day
11 it was that he and I talked, I suggested that since
12 Mr. Simon had not been there for a long time that
13 they use this as a teaching experience, that they
14 not terminate him, that they figure out how to have
15 some conversations with him about what the
16 expectations were with people that worked for St.
17 Patrick's and what their expectations were to be
18 working with us.

19 Q. So you claim that you told
20 Mr. D'Agostino not to terminate?

21 A. I definitely told him not to terminate
22 him.

23 Q. How did the issue of termination come
24 up?

25 A. He said they were going to look into it

1 were correct in telling Mr. D'Agostino what he
2 should tell one of his employees to do? What gave
3 you that authority?

4 **A. It's kind of who I am, and that I'm**
5 **trying to get something accomplished, and he is**
6 **interfering with the work we're trying to do on**
7 **behalf of unhoused people, and that he should not be**
8 **interfering in that work.**

9 Q. Would you agree that Mr. D'Agostino
10 could have said, No, I'm not telling him to leave?

11 **A. Yes.**

12 Q. Okay. At some point do you remember
13 calling Mr. D'Agostino later in the day and telling
14 him that you believe Mr. Simon had returned to the
15 encampment and was creating more problems?

16 **A. Yes.**

17 Q. Okay. And what was your information
18 based upon?

19 **A. Photographs that were sent to me by the**
20 **outreach worker. Richard Dixon in particular.**

21 Q. Okay.

22 **A. That he never actually left, so.**

23 Q. And do you specifically recall having
24 -- after March 27th, 2023, do you specifically
25 recall having additional conversations with

1 with Yusef, the captain of the police, the Refuse
2 Department and Forestry Department. She was not
3 involved in those conversations.

4 Q. And that's what she was upset about?

5 A. Yes.

6 Q. So looking at this After Action Agenda,
7 Topic: Encampments, based upon what we've talked
8 about, is it fair to say that an After Action
9 meeting -- this wasn't a regularly scheduled
10 meeting?

11 A. This was the only one that ever
12 happened.

13 Q. Okay. And you'll see it says: Ground
14 Rules, mutual respect for colleagues, avoid personal
15 attacks. Our goal is to protect the integrity of
16 the mayor and city government; do you see that?

17 A. Yes.

18 Q. Okay. Do you know -- and if you don't,
19 that's fine. Do you know what that's talking about:
20 Our goal is to protect the integrity of the mayor
21 and city government?

22 A. No, that's not wording or -- that's a
23 Sara Baker thing.

24 Q. Okay. Framing Questions, regarding the
25 riverfront: What was our goal, what did we expect

1 CERTIFICATE OF REPORTER

2 STATE OF MISSOURI)
3 CITY OF ST. LOUIS) ss.

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5 I, Ashley C. Huelsmann, a Certified
6 Court Reporter (MO), Certified Shorthand Reporter
7 (IL), Registered Professional Reporter, do hereby
8 certify that the witness whose testimony appears in
9 the foregoing deposition was duly sworn by me
10 pursuant to Section 492.010 RSMo; that the testimony
11 of said witness was taken by me to the best of my
12 ability and thereafter reduced to typewriting under
13 my direction; that I am neither counsel for, related
14 to, nor employed by any of the parties to the action
15 in which this deposition was taken, and further that
16 I am not a relative or employee of any attorney or
17 counsel employed by the parties thereto, nor
18 financially or otherwise interested in the outcome
19 of the action.

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